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October 14, 2021

The Honorable Nancy E. Brasel
United States District Court – State of Minnesota
316 North Robert Street, Courtroom 3A
St. Paul, Minnesota 55101

Re: Roe 1, et al. v. Allina Health System et al.
Court File No. 21-cv-02127-NEB-HB

Dear Judge Brasel:

This letter is sent regarding your Order that the Plaintiffs reveal to the Defendants the actual names of the Plaintiffs named pseudonymously in the caption of the complaint in the above referenced action. There are currently 188 Plaintiffs identified by a pseudonym in the complaint. I have been in contact with approximately 100 of these individuals to address your Order that I identify the actual names of these individuals to Defendants' counsel and how to proceed. I am working diligently to contact the remaining approximately 88 individuals regarding your order and how to proceed. As part of these discussions is the issue of whether these individuals want to proceed with their claims in light of your order. I obviously do not want to disclose the names of individuals I have not been able to get in contact with until after I have been able to discuss with each client your order. At present, your order requires each Plaintiff to disclose their name to their employer no later than the end of tomorrow, October 15. As part of my efforts to contact these individuals, I have sent emails to all of the clients and conducted a Zoom meeting with numerous clients last night. However, many of these Plaintiffs are medical professionals, have odd schedules, young children, etc. and, as a result, I have not been able to speak with them individually.

By this letter, I am requesting that you amend your order to allow Plaintiffs until October 19 to disclose their names to the Defendant employers. In what I hope will assist you in your decision making, I also want to inform the Court that I have entered into an agreement with opposing counsel that the Plaintiffs may have until October 22, 2021 to amend their complaint in this matter. As a result, Defendants will not have to answer the complaint until three weeks after the disclosure of the named Plaintiffs even with the extension.

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Thus, I would ask that the Court extend the Court's deadline to identify parties from Friday, October 15, to Tuesday, October 19 to provide me additional time to comply with my responsibilities to communicate with my clients before taking action that my clients may view as adverse to their interests.

If you should have any questions or need anything further, please do not hesitate to have your office contact me.

Very truly yours,

/s/Gregory M. Erickson

GME/mg